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July 29, 2025

Edgardo Ramos, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square NY, Courtroom 619
New York, NY, 10007

Via Electronic Filing

Re: Dumbo Moving v. Piece of Cake Moving et al. 1:22-cv-05138-ER

Dear Judge Ramos:

This firm represents Dumbo Moving & Storage, Inc., plaintiff in the above entitled action. An initial substantial production of over 60,000 documents was produced last Friday. We believe that the remaining documents remain on track for production by August 1, 2025. Notwithstanding the foregoing, we ask that you not so order the date because I am currently sitting shiva for my mother who passed away on Sunday. In regard to the remainder of the correspondence we will schedule a meet and confer upon my return to the office next week.

Very truly yours,

Avram E. Frisch

Cc: